# Exhibit F

## BakerHostetler

### Baker&Hostetler LLP

811 Main Street Suite 1100 Houston, TX 77002-6111

T 713.751.1600 F 713.751.1717 www.bakerlaw.com

Dean D. Hunt direct dial: 713.646.1346 dhunt@bakerlaw.com

September 2, 2014

#### Via Email and US Mail

Gregory Kinoian
Paul Hollander
Okin, Hollander & DeLuca, LLP
One Parker Plaza, 12th Floor
400 Kelby Street
Fairlawn, NJ 07024
phollander@ohdlaw.com
GKinoian@ohdlaw.com

Re: Adv. Pro. No. 10-04683 (SMB); Irving H. Picard, Trustee for the liquidation of Bernard L. Madoff Investment Securities LLC v. Laurel Kohl, individually and as a joint tenant, and Jodi M. Kohl, individually and as a joint tenant, in the United States Bankruptcy Court for the Southern District of New York.

#### Dear Counsel:

Pursuant to Judge Bernstein's Chambers' Rules and Rule 7007-1 of the Local Rules of the United States Bankruptcy Court of the Southern District of New York, this letter is another attempt by the Trustee to confer with you regarding the outstanding discovery in this case. Pursuant to the parties' Case Management Notice, Initial Disclosures were due on March 11, 2014. In an email dated March 26, 2014, you informed counsel for the Trustee that you were in the process of reviewing documents and expected to send them out the following week. I have also sent letters reminding you of such on May 22, June 25, August 26 and August 27, 2014. However, to date, we have not received the disclosures nor have you responded to voice mails from my colleague, Marie Carlisle, inquiring as to status of your clients' disclosures.

Further, the Trustee has not yet received either Laurel or Jodi Kohl's responses to interrogatories or requests for production served on June 25, 2014, which you acknowledged receipt of in a telephone call with Ms. Carlisle on July 1, 2014. Those responses were due on July 28, 2014. As I am certain you are aware, pursuant to

<sup>&</sup>lt;sup>1</sup> Further, on July 1, you requested, and were provided, an extension of time on the deadline to serve Interrogatories on the Trustee.

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Rules 33(b)(4) and 34 of the Federal Rules of Civil Procedure your clients have waived their right to any objections to the Trustee's discovery requests.

Before taking further action, as provided for by Judge Bernstein's Chambers' Rules and by the Local Rules of the United States Bankruptcy Court of the Southern District of New York, we are again reminding you of your client's obligations and attempting to confer with you to resolve these matters without resort to Court intervention, which we hope to avoid. If, however, we do not receive your clients' Initial Disclosures and discovery responses which are overdue as of the date of this letter, including the production of all responsive documents, within five (5) business days of the receipt of this letter, we will have no choice but to request a conference with Judge Bernstein to discuss your clients' dilatory conduct with respect to their discovery obligations.

Alternatively, if your clients are willing to agree to the enclosed stipulation and in so doing will provide the Trustee with a list of any subsequent transferees as described in Paragraph 6 of the proposed stipulation, we will agree to modify, and thereby limit, the Trustee's discovery requests to those not otherwise covered by the stipulation. However, if we have not received an executed copy of the stipulation or responses to the now overdue discovery requests from your clients within five (5) business days of the receipt of this letter, we will request a conference with Judge Bernstein.

I, as well as several of my colleagues, am available to discuss the above at your convenience. Please contact either me, Farrell Hochmuth, Rachel Smith or Marie Carlisle at 713-751-1600.

Dean D. Hunt

**Enclosures**